

In The United States District Court
For The Eastern District of Pennsylvania

Orlando Acosta, Edward
Lloyd, et al.,

Plaintiffs

Civil Action No.

2:17-CV-01462

v.

Democratic City Committee,
Elaine Tomlin, Emilio
Vasquez, et al.,

Defendants

FILED

JUN 01 2018

By KATE BARKMAN, Clerk
Dep. Clerk

Statement of Truth - State A Claim

I Edward M. Lloyd do hereby respectfully request
a Trial in the above mentioned case No. 2:17-cv-
01462. Defendants have requested that above case
be dismissed because Plaintiffs didn't state a claim.

Plaintiffs have stated a claim from the beginning of
this case of how they were damaged in the 2017
Special Election held in the 19th District.

I Edward Lloyd have diligently asked Attorneys researched,
and sought answers of the Defendants claim that we
didn't state a claim. To no avail that was
unsuccessful. ~~From~~ The Defendants never filed a
Motion stating the case had no merit, nor did
(1)

The defendants or their counsel Admit or Deny any of The Allegations we stated in The Case reference The Special Election held on Tuesday March 21st 2017. The Defendants have done nothing but argue Jurisdiction and once The Courts gave an Opinion and allowed for a second Amended Complaint, Plaintiffs filed an second Amended Complaint. Then Defendants filed Motion To Dismiss. Though several parties connected To The Alleged Fraud and Corruption in The Special Election was charged by State Attorney General Josh Shapiro and either They Took A Plea Deal, Found Guilty of several counts of Felonies and Misdemeanors in regard To The Special Election- held on Tuesday March 21st 2017, also 1 more defendant has a Trial scheduled in June, 2018. Those defendants had Ties To The Defendants in This case Emilio Vasquez (Candidate- Ward Leader 43rd Ward) and The Democratic Party including The County Board of Elections who hired and Trained Those Election Board Workers.

I Edward Lloyd will ATtempT To Answer my understanding of "State A claim" That Defendants are claiming we didn't "State". I Edward M. Lloyd Jr. an Elected City and State Committeeman in The 3rd Senatorial District and 42nd Ward 6th

(2)

Division which is in the 197th State Legislative District, Has run for the State seat since 2012 after the re-districting, previously was the 180th District. In 2012 I tried running and I took my Petitions to Harrisburg seeking to be a Candidate on the Ballot. I was unsuccessful I came up short with enough of the required signatures, I accepted that ruling. In 2014 I ran again and I successfully made it on the Ballot actually I was number 1 on the Ballot in Harrisburg then a furious last minute challenge by another Candidate that I wasn't properly served by law was taken to Commonwealth Court. In which I informed the Judge I myself wasn't served and I bought several registered voters to court with my Election Workers to testify that they indeed were registered to vote in the 197th District and lived in the 197th District. Though the State Accepted my Petition, and I proved that some of the signatures they were challenging was legit (they even challenged my wife and children's registration/signatures. The Judge said well, its 3:00pm you have 2 hours to bring in approx 300 more people to prove they were registered and that was their signature (Impossible Mission) or I could appeal to the Higher Court. I stated I don't have

*\$20,000.00 - \$50,000.00 dollars That Attorneys wanted to charge me to do that. I also informed the Court/Judge that the Gentleman who challenged me Danilo Burgos and his Attorney Mr. Vance offered me \$20,000.00 and a Job if he won if I was willing to back out the race and stop fighting or going thru the signature at the County Board of Elections that the Judge ordered us to go to match up the signatures on the Petitions that they were trying to get tossed. She asked me if I had evidence or ^{witnesses} proof of them saying that to me I said no it was just us 3 there and of course they denied it. Again I accepted the defeat and took the loss, Lesson learned. The Judge removed my name off the Ballot #1 but left my name on the Ballot for State Comm. Steeman and City Comm. Steeman. If my signature was no good for State Representative then it shouldn't have been good for State Comm. Steeman or City Comm. Steeman. My Constituents and the Voters thought they were voting for me for State Representative that year I had more votes in theory than Leslie Acosta, Danilo Burgos, and other Candidates if the Frivious challenge didn't happen and my name wasn't removed for State Representative. The Voters

of the 197th District didn't understand that I was removed for State Rep. Their intention was to vote for me. If you look at the votes I received for State Commissioner and the votes that Leslie Acosta and Danilo Burgos had combined I had 3x+ their votes. The people of the 197th District wasn't allowed to vote for who they truly wanted.

Then in 2016 Leslie Acosta pled guilty to Corruption and the Democratic Party knew of all her legal issues but still supported her in the 2016 Primary she went unchallenged because she was the Incumbent. Then after the 2016 Primary the Corruption of Renee Tatyah, Sandy Acosta, and Leslie Acosta came out. So in the November General Election several Write-In Candidates including myself did a write-in campaign. I received the most votes of that General Election (50 Total). I received a phone call from the Commission's office stating if Leslie is forced to resign or resigns due to the Corruption Case I would be declared the Winner. Leslie Acosta and the Democratic Party knew that and she prolonged herself from resigning though the State House was pressuring her to stop down.

Mr. Orlando Acosta another Write-In Candidate of That 2016 General Election (14-16 votes) Filed a challenge In Commonwealth Court To declare him the winner because he was the only one who filed a challenge that Leslie Acosta wasn't eligible to hold her seat because she Took A Plea Deal (Pled guilty) in the Corruption Case of Renee Todayline, Sandy Acosta, and herself Leslie Acosta. The Court dismissed his case. Then after a lot of pressure from the State House telling Leslie Acosta she wasn't welcome on the Floor and wouldn't be able to represent the 197th she announced she would resign. The House then announced a Special Election to be held on Tuesday March 21st 2017. I thought this was a perfect opportunity for me again to run for office to represent the 197th District. The rules for the Special Election was the Parties could Endorse their Candidates. The Republican Party Endorsed Lucinda Little (allegedly was living in Florida and registered to vote in Florida) The Democratic Party Endorsed Freddie Ramirez (allegedly was living in Bucks County) and The Green Party Endorsed Cheri Honkala. Cheri Honkala was removed from the Ballot because she filed her papers a day late. Freddie Ramirez was challenged in Court reference his Residency (he lost) and was removed. Leaving Lucinda

(6)

Little The only Eligible/Legal candidate to run. Though she was running as a republican candidate she was seen twice on camera leaving The Democratic Parties Headquarters on Spring Garden Street reported by The News Media.

The Democratic Party tried defending Freddie Ramirez residency claiming he lived in The 43rd Ward in The 197th District but The Courts ruled he didn't and gave The Democratic Party a chance to replace or Endorse another Candidate a meeting was held amongst The Ward Leaders and They decided to stick with Freddie Ramirez. Then The Courts ruled that no Democrat only The Republican would be on The Ballot.

Wherefore The Ward Leaders and Democratic Committee held (2) meetings last one was held at The Democratic City Committee Headquarters to Announce They were going to back Emilio Vazquez as The Write-In Candidate. My name was mentioned by The Ward leader Elaine Tomlin but The vote went to Emilio by all The Ward Leaders.

I Then prepared and Campaigned in The 197th District going door to door Canvassing The District and Talking to The Voters for Their support once again on Election day

On Tuesday, March 21st, 2017 The Special Election.

I Edward Lloyd was informed by Then Elected Comm. Rep. Bryant Hill 42nd - 6 Division that a meeting was held with ^{Election Workers} Comm. Treepeople & The Democratic Ward leader and Candidate Emilio Vasquez and they were discussing how they were going to cheat on Election Day March 21st, 2017. He (Bryant Hill) spoke up and stated I'm not doing that it's wrong and illegal. Then after the meeting Candidate Emilio Vasquez pulled him to the side and asked him why he was in on Board to support him. All this information was given to Special Agent Mittyh from State Attorney General Josh Shapiro.

Due to All The Corruption, Fraud, and Conspiracy to cheat on Election Day by Election Board Workers, Wardleaders, and Comm. Treepeople. I was damaged Emotionally, Financially, I haven't been able to gain Employment since I filed This Lawsuit last year. I had to file Bankruptcy due to the loss I took and I funded my own campaign from my wife and I pensions and life savings leaving a bitter atmosphere in my household from the actions of The Defendants and that I'm not able to gain Employment in which I believe it's out of retaliation of This

case, I lost my car it was repossessed. I spent & lost
 approximately \$50,000.00 of my life savings my
 pension & wife's pension to run for office and
 all I wanted was a Fair, Honest, Equally Opportunity
 to run for State Representative and that was
 taken away from me several times. The first
 few times I took as lessons I accepted my
 loss, but this last Election I had to seek
 help by the Federal Courts because they were
 just bold in how they conspired and acted on
 cheating on Election Day, March 21st, 2017.
 I have lost weight tremendously, I have been
 depressed, My family is upset with me to the
 point I have been considering moving to get
 a fresh start. I have been contemplating resigning
 and leaving the Democratic Party, because of
 what they keep doing to me. I have done & served &
 supported the Democratic Party for approx 30 years.
 since I was a little boy I had dreams &
 wished to be a State Representative representing people
 where I resided (^{district} community). All of that has
 been crushed I sit back and see how so
 many people can fulfill their dreams and I've
 been victimized and mine has been stolen, not
 once, not twice, but three times. I have tried
 to stay positive and strong keeping my faith and
 believe in God. And I'm actually writing this.

because the Lord Touched my heart for the 3rd Time during this case- To submit this but I was Told by people the last 2x not too but the Lord spoke to me again last night and I have to be obedient.

Your Honor I'm no lawyer, I'm not rich, and I don't have much but what I do have and always have is my Honor, Respect, Love for People, my Community, my Dedicated will of Service of Helping People. I'm not perfect I have made a lot of mistakes in my life time but my mistakes help change my life around and God knows all I ever wanted to do is do the same for others. My work speaks for itself, I forgive all those that have done wrong to me, for they know not what they do or done. I would've been a great leader in the 197th District. I understand nothing in life is perfect but we live in a World and Country of Opportunity and though I don't have a Degree or I'm not the smartest person I can hold my head up high knowing I followed the Law & Rules. My Opportunity was stolen by individuals for whatever the reason but those same individuals that blocked me from the Democratic Party in the 197th District since 2012 have been accused or found guilty of some kind of Fraud & Corruption from

J.P. Miranda, Leslie Acosta, to this case, I only wanted to have my day in court and let a Judge or Jury decide on what was done legally or illegally.

I will end with this I was a little boy/youngman who was raised to be honest no matter what right or wrong I was raised in Church Fountain of Life Center. I took care of my Father (20) heart attacks bound to wheelchair and my mother and grandmother starting at the age of 11 years old. I didn't have the same path as other children I was mainly home schooled and received my G.E.D. at Temple due to my family responsibilities & other reasons. Yes I made mistakes as a youngman but I learned and grew up and took responsibility and became a man I took continued caring for my terminally ill mother from 11 years of age (she wasn't supposed to live past 37 years old) until 41 years old (my mother was 61 years old when she passed) I did that on my own out of 20 children siblings. I was allowed by the Courts to be her power of Attorney and Care giver at a young age. My dad and grandmother had passed away and left a house that was in Foreclosure. I applied to be Administrator and the Courts granted me Administrator of my Dad's Estate. My stepmother and sisters and Brothers wanted the House to go to Foreclosure & be sold at

sheriff's sale (at the time the house value was at approximately \$57,000.00 in needed a lot of repairs.) So I asked the Judge for an opportunity to save the house I was raised in that I took care of my Grandmother & Dad in. He told my siblings I'm going to grant him an opportunity to save the house I was only approx 22 yrs old. So the Judge gave me 7 years to fix it up & save it. I was able to fix it up bringing the value from \$57,000.00 to approx \$150,000.00. I went to a real estate Investor that my Attorney that was handling the Estate referred me to I was advised let the house go to sheriff's sale I put up \$20,000.00 and the Real Estate Investor put up \$60,000.00 to buy it back from the bank at sheriff's sale I was young and didn't know anything I trusted my Attorney and after we won the bid at the sheriff's sale. We paid the sheriff's office and then as we were leaving the Realtor says to me you have to turn/sign the house deed over to me until you pay me the \$60,000.00 back not knowing I trusted this man and this Lawyer of mine and signed it over not knowing I was being screwed. The next day I got a postcard in the mail from this real estate Investor Key Properties stating he just sold my house. I called the Attorney he played dumb and upset

I immediately rushed to the Judge that gave me the opportunity to save my family home, He saw that I was railroaded and stated sit down I'm going to have to recuse myself from the case but I'm going to tell you what to go do immediately. He advised me a 22 yr old kid who was just trying to do right. To go file a Lis-pendens to stop him from selling my home then he said he advise me to find an attorney to sue both the attorney & realtor for malpractice & usury & fraud, What that Judge did was allow me to have a fighting chance in court before another Judge/Jury and we won that case.

Wherefore I am respectfully requesting this said court the Honorable Judge Joel Slomsky to grant me and the other Plaintiffs a fair opportunity and chance to go to trial against those who have caused Emotional and Financial and other harms due to the illegal activity, conspiracy, fraud, and cheating that occurred on Tuesday March 21st 2017 Special Election, in the 197th District.

In God We Trust, Asking for Mercy from the Court to Deny the Defendants request of Dismissal

stating we didn't state a claim, The facts and all the changes that have occurred surrounding these allegations, The lawsuit that was filed on March 31st 2017, The defendants that were charged and pled guilty or found guilty, The Wardleaders and Elected Board Members including Commissioner who stepped down due to this case. And even Mr. Emilio Vasquez who ran as Incumbent again in the 2018 Primary didn't even get half the votes he claims to have gotten as a write-in candidate. Should be all taken into consideration. I personally am not seeking 10 million dollars or 5 millions or 1 million dollars. I'm only asking to be heard a trial, and my wife, myself and family be made whole due to the Defendants illegal behavior and needs reference the 197th District Election, Thank you. God Bless.

Respectfully Submitted
Edward M. Lloyd

06/01/2018

Positions of Elected Official - Voted by The People

14. Register of voters (1)
 15. City Commissioners (3)
 16. City Council Members - District
 17. State Representatives - District
 18. State District Senators
 19. At-Large City Council Member
 20. (City Commissioner / Commissioner
State Commissioner / Commissioner)
 21. Judge of Election - Elected or Appointed by Court
of Common Pleas
 22. Mayor, Inspector -
 23. Minority Inspector -
 24. Clerk - Appointed by Mayor, Inspector
 25. Machine Inspector - Appointed by City Commissioner
- A. Ward Leader (* NOTE)
- B. Chairman
- C. Party Chair
- All voted in by Commissioner people
must be an Elected Commissioner
to vote Legally.

Positions of Elected officials - Voted by The People.

1. { President of The United States,
Vice President of The United States }
2. Governor of Each State
3. Senators of Each State
4. Judges of Supreme Court
5. Judges of Superior Court
6. Judges of Commonwealth Court
7. Judges of Common Pleas Court
8. Judges of Municipal Court
9. District Attorney of City, Suburb, Town, etc.
10. Attorney General of Each State
11. United States Attorney General
12. Mayor - City, Suburb, Town, etc.
13. Sheriff - City, County, Town, etc.

① Governor - T. Wolf

② Speaker of the House - M. Turzai

③ Dep of State P. Cane

④ Pennsylvania Dept of State
Bureau of Commission
Elections and Legislative

⑤ Philadelphia County Board
of Elections

⑥ City Commissioners
Lisa DeLoe
Anthony Clark
AL Schardt

⑦ Democratic City Committee
Bob Brady
Register - City Committee

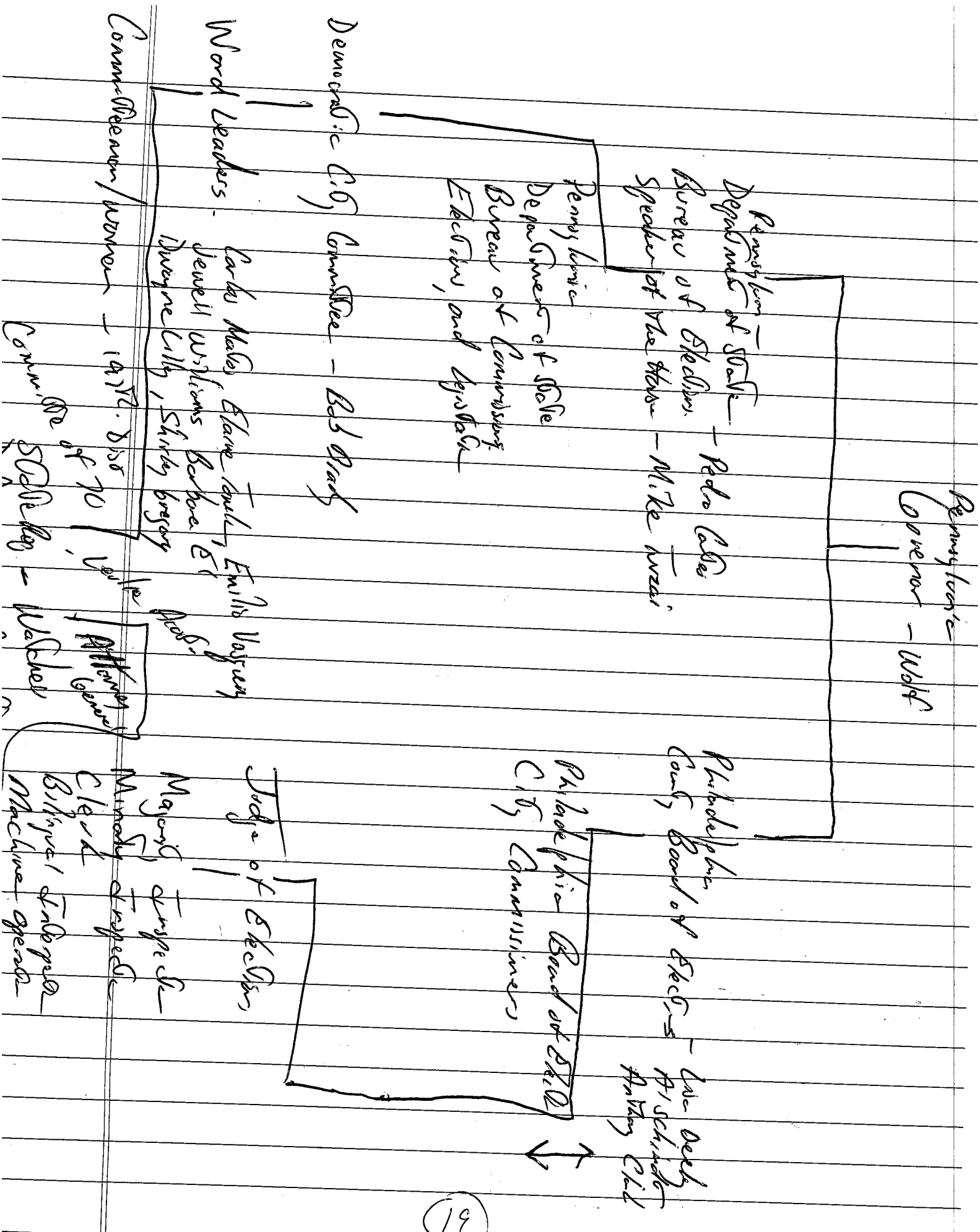
⑧ Ward Leaders 1977
Elaine Toms
Carlos Mabe
Dwight Lilley
Emilio Vasquez
Jewell Williams
Shirley Gregory
Barbara El

⑨ State Rep
(?) Leslie Acar
(?) Emilio Vasquez

⑩ Comm. Free people - 1977

⑪ Judge of Election
Mayor, Inspector
Minority Inspector
Clerk
Machine Operator
Bilingual Inspectors

(12) Walters
Dispute Attorney
Committee of 70
Attorney General



1. Governor Roll -
2. Secretary of State Roll -
3. Speaker of The House Roll -
4. Department of State Bureau Roll -
5. Canvg Board of Elections Roll -
6. City Commissioners Rolls -
7. District Attorneys Roll -

8. Committee of 70 Roll -
9. Democratic State Committee Roll -
10. Democratic City Committee Roll -
11. Democratic State Committee Chairman Roll - Groe, Mark
12. Democratic City Committee Chair Roll - Brady, Bob
13. Ward Leaders In The District Roll - 197th
14. Mayor's Inspectors Roll -
(21)

15. Judge of Election Roll -

16. Minority Inspector Roll -

17. Clerk Roll -

18. Machine Operators Roll -

19. Comm. Person State Roll -

20. Comm. Person City Roll -

21. State Representative Roll -

22. Attorney General Roll

* 23. US Attorney General Roll (P)

24. Roll Watchers Roll - (Certificates for Candidates
Watchers.)

25. Roll of Lieutenants Governor -